

The Honorable John C. Coughenour

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

CONTINENTAL CASUALTY COMPANY  
Plaintiff,

v.

ROSALINDA HERRERA HEREDIA,  
individually and as parent and guardian of  
A.R.H., a minor; JUAN REYES TAPIA;  
LESLIE REYES-HERRERA; ANA  
HERRERA HEREDIA, individually and as  
parent and guardian of E.H., a minor;  
EDUARDO HERNANDEZ HERRERA;  
SAMPSON KWAKU GYAN and  
GEORGINA TWUMWAA GYAN, both  
individually and as parents and guardians of  
M.G., a minor; AMANDA POMAA GYAN;  
FRANCIS KWADWO GYAN; ANGELINA  
ADOMA GYAN; MEUY CHANG  
SAETURN and BUON  
DUANGPRASAERT, both individually and  
as parents and guardians of A.D., a minor;  
GIFTY EGHAN; JOYCE MENSAH,  
individually and as parent and guardian of  
E.D., a minor, and JUSTIN ALEXANDER  
(as assignees of VIP International Real Estate  
Group, Inc.); and VIP International Real  
Estate Group, Inc., a Washington corporation.  
Defendants.

NO. 2:24-cv-00917-JCC

**STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF TIME  
FOR DEFENDANTS TO RESPOND  
TO FIRST AMENDED COMPLAINT**

**NOTE ON MOTION CALENDAR:  
OCTOBER 2, 2024**

STIPULATION AND ~~PROPOSED~~ ORDER FOR  
EXTENSION OF TIME FOR DEFENDANTS TO  
RESPOND TO FIRST AMENDED COMPLAINT - 1

STRITMATTER KESSLER KOEHLER MOORE  
3600 15<sup>th</sup> Ave W, #300 | Seattle, WA 98119  
Tel: 206-448-1777

1 WHEREAS, pursuant to Fed. R. Civ. P. 6(b)(1)(A), Plaintiff and Defendants stipulate to  
2 extend the time for Defendants to answer or otherwise respond to Plaintiff's First Amended  
3 Complaint until November 1, 2024. Counsel for Plaintiff and Defendants have conferred  
4 regarding this request. Good cause exists for this request because there are numerous defendants  
5 who require more time to adequately investigate and respond.

6 By execution of this stipulation, Defendants do not waive any defenses. Each side  
7 preserves all of their respective rights and positions, and both sides agree that the execution of  
8 this stipulation shall not impact their respective rights and positions.

9 WHEREAS, Defendants have not requested previous extensions from this Court. A  
10 proposed order is submitted with this stipulation.

11 IT IS THEREFORE STIPULATED AND AGREED, by and between Plaintiff and  
12 Defendants, by and through their counsel and subject to approval of this Court.

13 DATED this 2<sup>nd</sup> day of October, 2024.

14 STRITMATTER KESSLER KOEHLER MOORE

15 s/ Brad J. Moore

BRAD J. MOORE, WSBA #21802

16 s/ Andrew Ackley

ANDREW ACKLEY, WSBA #41752

17 s/ Lisa Benedetti

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Counsel for Defendants

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16 Attorneys for Plaintiff Continental  
17 Casualty Company  
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**PROPOSED ORDER**

Based upon the foregoing Stipulation, and the Court being fully advised in the premises,  
NOW, THEREFORE,

IT IS HEREBY ORDERED that the deadline for Defendants to file their Response  
Answer to Plaintiff's First Amended Complaint is extended by thirty (30) days and is now due  
on or before November 1, 2024.

Dated this 3rd day of October, 2024.

A handwritten signature in black ink, reading "John C. Coughenour", written over a horizontal line.

The Honorable John C. Coughenour  
United States District Judge